

GTT *PRIVACY DATA SHEET*

FOR Virtual Data Centre (VDC) Service

SERVICE DESCRIPTION

This document provides information on how and why we process personal data in connection to the Service, where we store and transfer that personal data, how we keep it secure, and how we comply with applicable privacy laws and regulations. We will process personal data in accordance with this Privacy Sheet and with our [Privacy Policy](#).

The Service is a cloud computing Infrastructure as a Service (IaaS) model made available by GTT (“we,” “us,” “our”) for companies (“Client,” “you,” or “your”). It can provide on-demand computing, storage and networking, as well as applications, all of which can be seamlessly integrated into an organization's existing IT infrastructure. The Virtual Data Center solution gives organizations the opportunity of adding capacity or installing a new IT infrastructure without the need to buy or install costly hardware, which takes up additional manpower, space, and power.

For a comprehensive understanding of the Service and its associated commitments, including Service Level Agreements (SLAs), please refer to the GTT Virtual Data Centre (VDC) Schedule, available upon request.

TYPES OF (CLIENT) END USER DATA

- Network identifiers and traffic metadata, including IP/MAC addresses of customer systems and end-user devices, plus abstracted TCP/UDP application traffic data.
- User authentication Information, such as user login details
- Geo-location information (reverse IP look-up, GPS coordinates, Wi-Fi) of customer systems
- Geo-Location Information (reverse IP look-up, GPS coordinates, Wi-Fi, cell ID) of end-user desktops and devices
- Client personal data, contents of which are solely determined by the Client



PURPOSE OF PROCESSING (PROCESSOR)

- Service Provision
- Reporting
- Service Management
- Technical Monitoring
- Customer Support
- Troubleshooting

DATA DELETION & RETENTION

The table below lists the applicable retention periods for each category of personal data processed by GTT in connection to the Service.

Categories of Personal Data	Retention Period
End User Client Personal Data	For the duration of the Service and for 30 days following Service expiration or as required by applicable law.

DATA LOCATION & STORAGE

Storage Location (Subprocessors)	Access Location
Client Personal Data hosted in GTT-enabled data center. GTT provisions exclusive storage at each client location where services are delivered. Data residency is tied to that location by default; replication or migration to other regions occurs only as instructed by the client and in accordance with the applicable Data Processing Agreement and applicable transfer mechanisms.	GTT Personnel: Authorized personnel located in Bulgaria, India, and USA or other locations with authenticated access into the appropriate management platform. Client: Authorized Client employees, contractors, representatives and end-users depending on their country's location. Sub-processor: Authorized sub-processor personnel with authenticated access into the appropriate management platform depending on their country location.



PERSONAL DATA TRANSFER

To ensure compliant data transfers across jurisdictions, GTT has established an Intra Group Data Transfer Agreement (IGDTA) between GTT's entities. This agreement utilizes the EU Standard Contractual Clauses and other applicable data transfer mechanisms as needed to maintain lawful and secure data processing practices.

ACCESS TO PERSONAL DATA

Users, Client, and GTT can access personal data in connection to the Service as described in the table below.

Categories of Personal Data	Parties with Access	Access Control
Client Personal data	• Designated employees authorized to troubleshoot hosting services • Client via the service offered • Potentially GTT's third-party sub-contractors authorized to troubleshoot hosting services	• Internal access controls • User authentication • Restricted access may be provided upon request by the Client.



THIRD-PARTY SERVICE PROVIDERS (SUB-PROCESSORS)

Below is a list of third-party service providers that GTT may use to deliver the service, along with links to their respective privacy policies. Users, Clients, and GTT can access personal data related to the Service, as detailed in the table below.

Third-Party Suppliers	Country	Supplier's Privacy Statement
Red Hat Inc.	Global	https://www.redhat.com/en/about/privacy-policy
Microsoft Inc.	Global	https://privacy.microsoft.com/en-us/privacystatement
Oracle Corporation	Global	https://www.oracle.com/legal/privacy/services-privacy-policy/#1-1
LiveChat Software	Global	https://www.livechat.com/legal/privacy-policy/
Veritas	Global	https://www.veritas.com/why-veritas/trust/privacy
Cloudian	Global	https://cloudian.com/privacy-policy/
ServiceNow	Global	https://www.servicenow.com/service-privacy.html
ShapeBlue	Global	https://www.shapeblue.com/privacy-policy/
Canonical	Global	https://canonical.com/legal/data-privacy
NetApp	Global	https://www.netapp.com/company/legal/privacy-policy/